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Attorneys for BLUE CROSS BLUE
SHIELD HEALTHCARE PLAN OF
GEORGIA, INC.

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

SUNRISE MOUNTAINVIEW
HOSPITAL, INC. D/B/A
MOUNTAINVIEW HOSPITAL; and
SOUTHERN HILLS MEDICAL
CENTER, LLC D/B/A SOUTHERN
HILLS HOSPITAL AND MEDICAL
CENTER,

Plaintiffs,

v.

BLUE CROSS BLUE SHIELD
HEALTHCARE PLAN OF GEORGIA,
INC.,

Defendants.

Case No. 2:23-cv-00992-MMD-BNW
Hon. Miranda M. Du

**JOINT STIPULATION AND
[PROPOSED] ORDER TO EXTEND
TIME FOR DEFENDANT TO
PRODUCE ANY ADMINISTRATIVE
RECORD BY 21 DAYS**

(SECOND REQUEST)
Action Filed: June 27, 2023

Plaintiffs Sunrise Mountainview Hospital, Inc. d/b/a Mountainview Hospital and

1 Southern Hills Medical Center, LLC d/b/a Southern Hills Hospital and Medical Center
 2 (“Plaintiffs”) and Defendant Blue Cross Blue Shield Healthcare Plan of Georgia, Inc.
 3 (“Defendant”) (collectively the “Parties”) hereby stipulate, by and through their respective
 4 counsel of record, and request that the Court grant a 21-day extension of time for Defendant
 5 to produce any administrative record, as follows:

6 1. On March 22, 2024, the Court entered a scheduling order [ECF No. 29] setting
 7 the deadline to produce any administrative record 90 days from the answer deadline, which
 8 is June 19, 2024. By way of reference, the deadline to file any motion for judgment on the
 9 administrative record for claims governed by the Employee Retirement Income Security
 10 Act of 1974, as amended (“ERISA”) is September 12, 2024 and the deadline to complete
 11 discovery on any claim not governed by ERISA is September 17, 2024, and [ECF No. 29.]

12 2. The parties have agreed to extend the deadline for Defendant to produce any
 13 administrative record to allow time for informal discussions for resolution. As such, the
 14 parties request that the Court grant their joint request to extend the deadline for Defendant
 15 to produce the administrative record by twenty-one (21) days, to July 10, 2024.

16 3. The parties agree that good cause exists for this extension and that no party
 17 will be prejudiced. The next deadline on the scheduling order (deadline to file a motion
 18 for judgment on the administrative record of September 12, 2024) will not be affected by
 19 this stipulated request.

20 4. This is Defendant’s second request for an extension of time,¹ but first request
 21 for an extension in connection with a deadline in the scheduling order.

22 **THE PARTIES HEREBY STIPULATE, AGREE** and request that the Court
 23 extend Defendant’s deadline to produce any administrative record to and including July 10,
 24 2024.

25
 26
 27 ¹ Defendant’s first request for extension was in connection with the deadline to respond to
 28 the complaint.

1 Dated: June 17, 2024

2 POLSINELLI PC

3 By: /s/ Adam D. Chilton

4 Adam D. Chilton

Attorneys for Plaintiffs

5 Dated: June 17, 2023

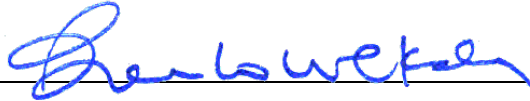
6 PRHLAW LLC

7 By: /s/ Jennifer H. Chung

8 Jennifer H. Chung

9 Attorneys for Defendant

10
11 **IT IS SO ORDERED:**

12
13 

14 UNITED STATES MAGISTRATE JUDGE

15 DATED: June 18, 2024

CERTIFICATE OF SERVICE

Pursuant to FED. R. CIV. P. 5(b), I hereby certify that I am an employee of McDowell Hetherington LLP and that on this 17th day of June, 2024, I caused the foregoing JOINT STIPULATION AND [PROPOSED] ORDER TO EXTEND DEFENDANT'S TIME TO PRODUCE THE ADMINISTRATIVE RECORD BY 21 DAYS to be served by the Court's CM/ECF System on all parties and counsel of record.

/s/Jennifer H. Chung

Jennifer H. Chung